

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

THE STATE OF TEXAS, et al.,	§	
	§	
Plaintiffs,	§	
v.	§	Civil Action No. 4:20-cv-00957-SDJ
	§	
GOOGLE LLC,	§	
	§	
Defendant.	§	

**JOINT MOTION FOR AN ORDER
FOR REPRODUCTION OF DISCOVERY**

Defendant Google LLC (“Google”) and Plaintiffs jointly move the Court to enter the parties’ Stipulation and Proposed Order for Reproduction of Discovery (“Proposed Order”), attached as Exhibit A.

Following remand of this case from *In re Google Digital Advertising Antitrust Litig.*, No. 1:21-md-03010 (S.D.N.Y.) (“MDL”), and in the absence of an operative coordination order, the parties are currently unable to use in this case the relevant discovery materials produced by third parties in *United States v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.) (“EDVA Action”) during the coordinated discovery period between the EDVA Action and the MDL. The Proposed Order is to enable the parties to use those relevant discovery materials in this case in a manner that is consistent with the governing Modified Protective Order in the EDVA Action (entered as docket entry 203 in the EDVA Action). If entered, Google will promptly serve the Order on third parties in the EDVA Action to afford them an opportunity to seek a protective order from this Court.

Therefore, the parties respectfully request that this Court enter the Proposed Order.

Dated: April 23, 2024

Respectfully submitted,

/s/ W. Mark Lanier

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CERTIFICATE OF SERVICE

I certify that on April 23, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ R. Paul Yetter
R. Paul Yetter

CERTIFICATE OF CONFERENCE

I certify that the meet and confer requirements in Local Rule CV-7(h) have been met. This motion is consented to and not opposed by any party.

/s/ R. Paul Yetter
R. Paul Yetter

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	§	
GOOGLE LLC,	§	
	§	
Defendant.	§	

STIPULATION AND PROPOSED ORDER FOR REPRODUCTION OF DISCOVERY

This stipulation and proposed order is entered into by Plaintiffs and Defendant Google LLC. It is stipulated and agreed by Plaintiffs and Google, and ordered by the Court, that:

- (1) Subject to and consistent with Paragraphs 25 through 27 of the Modified Protective Order (entered as docket entry 203 in *United States v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.) (“EDVA Action”)) in the EDVA Action, Google shall reproduce in this case productions that any non-party in the EDVA Action (“EDVA Non-Parties”) made in connection with the EDVA Action (to the extent not already shared with Plaintiffs in this case) or the United States’s related pre-suit investigation into Google. To the extent any of these materials were designated as “Confidential” or “Highly Confidential” under the Modified Protective Order in the EDVA Action, they shall be treated as “Confidential” or “Highly Confidential,” as designated, under the Confidentiality Order governing this case (ECF No. 182).
- (2) Subject to and consistent with Paragraphs 25 through 27 of the Modified Protective Order in the EDVA Action, Google shall reproduce in this case copies of all

unredacted transcripts and exhibits of EDVA Non-Party depositions that were taken in the EDVA Action. To the extent any portions of these transcripts and exhibits were designated as “Confidential” or “Highly Confidential” under the Modified Protective Order in the EDVA Action, they shall be treated as “Confidential” or “Highly Confidential,” as designated, under the Confidentiality Order governing this case (ECF No. 182).

- (3) Any EDVA Non-Party that wishes to object to the reproduction of the materials described in Paragraphs 1 and 2 of this Order shall seek a protective order with this Court within 7 days of Google’s service of this Order on that EDVA Non-Party. If no such protective order is sought or if a protective order is sought and denied, the Parties will be able to use and rely on that EDVA Non-Party’s materials in this case. Any reproductions of EDVA Non-Party’s materials shall be made within five business days of the above-described 7-day period or, if applicable, within five business days of the denial of the motion for protective order.
- (4) All materials reproduced by Google as described in Paragraphs 1, 2, and 3 of this Order, as well as all materials directly produced by EDVA Non-Parties in this case, can be used in this case as if they were produced by the EDVA Non-Party in this case before the close of fact discovery in this case.

It is so stipulated, through parties’ respective counsel, and Ordered by the Court on this ____ day of April, 2024.

Sean D. Jordan
United States District Judge

/s/ W. Mark Lanier

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I certify that, on April 23, 2024, this document was filed electronically in compliance with Local Rule CV-5(a) and served on all counsel who have consented to electronic service, per Local Rule CV-5(a)(3)(A).

/s/ R. Paul Yetter
R. Paul Yetter